

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

WILLIE STRICKLAND, #226537,)	
)	
Plaintiff,)	
)	
v.)	CV NO. 2:05-CV-931-F
)	
SAMUEL RAYAPATI, et. al.,)	
)	
Defendants.)	

MOTION FOR ENLARGEMENT OF TIME
TO FILE SPECIAL REPORT

COMES NOW, the defendant, **J.C. Giles**, by and through the Attorney General for the State of Alabama, Honorable Troy King, and moves, pursuant to Federal Rules of Civil Procedure (FRCVP) 6(b)(1), for an enlargement of time to comply with this Honorable Court's October 17, 2005 ORDER, establishing a deadline for the defendant to comply. Due to the length and complexity of plaintiff's complaint and the amount of legal issues presented, the undersigned has encountered some difficulty and delay in securing the affidavit and other discovery materials ordered by this Court. Accordingly, the undersigned respectfully requests an additional 40 days to gather the necessary information and file the Special Report.

Respectfully submitted,

TROY KING
ATTORNEY GENERAL

/s/ MATTHEW Y. BEAM
MATTHEW Y. BEAM (BEA065)
ASSISTANT ATTORNEY GENERAL

ADDRESS OF COUNSEL

Office of the Attorney General
General Civil Litigation
11 South Union Street
Montgomery, Alabama 36130
(334) 242-7340
(334) 242-2433 fax

CERTIFICATE OF SERVICE

I hereby certify that this 28th day of November, 2005 served a copy of the foregoing on the plaintiff by placing same in the United States mail, postage prepaid and addressed as follows:

Mr. Willie Strickland
AIS 226537
Ventress Correctional Facility
P.O. Box 767
Clayton, Alabama 36016-0767

/s/ MATTHEW Y. BEAM
MATTHEW Y. BEAM (BEA065)
ASSISTANT ATTORNEY GENERAL